

**City of Los Angeles
Department of Water and Power**

**CALFED Bay-Delta Program Programmatic EIS/EIR
Water Use Efficiency Component**

Comments

1. It should be recognized that the City of Los Angeles, as well as the majority of the South Coast region, has been implementing aggressive conservation measures as required by the BMPs. CALFED must focus on a statewide water-use efficiency program. In addition to an aggressive conservation program for the urban water users, CALFED must also focus on the agricultural sector, which has the greatest potential (quantity) to produce conserved water for transfers to areas of need. (p. 1-5)
2. The draft PEIR/EIS states that opportunities exist to further reduce indoor use to as low as 50 to 60 gallons per capita per day (gpcd). Though these values may be attainable, it will take a major change, and not a continuation of, the lifestyle habits of all Californians. As a point of information, Los Angeles' estimated indoor water use from January through April 1998, four winter months with above normal rainfall, was 77 gpcd, with conservation levels near 20 percent. The draft PEIR/EIS assumptions project an additional reduction in water use of up to 35 percent from Los Angeles' current levels. (p. 5-11)
3. The estimates reported in this section may lead certain proponents to an expectation that water recycling production must be at these levels by 2020. The draft PEIR/EIS pointed out the existence of factors that significantly limit water agencies' abilities to implement water recycling programs. The City of Los Angeles has adopted a goal of recycling up to 80,000 acre-feet per year, or 10 percent of its total demands, by the year 2010. In light of the current restrictive regulatory, institutional, and financial climate, LADWP considers this an ambitious, but attainable goal. CALFED should present realistic and attainable goals based on validated data to avoid conflicts arising out of the assurances that are to be developed as part of the overall Bay-Delta program. (p. 6-5)
4. The concept of a neutral party "information clearinghouse" to analyze potential water transfer impacts and assume the central role for sellers and buyers to obtain information appears to be workable and should be explored. (p. 7-16)
5. There is a conscious effort in the draft PEIR/EIS to emphasize that the estimates for conservation efforts are only for assisting in the programmatic level impact analysis, and not for planning purposes. LADWP strongly recommends that CALFED present an aggressive conservation program in a manner that will minimize the potential for future inconsistencies with other aspects of the program.